

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

GOVERNMENT EMPLOYEES INSURANCE  
CO., et al.,

–against–

ZAITSEV, et al.,

Plaintiffs,

Defendants.

Case No.: 1:20-cv-03495-FB-LKE

**STIPULATION AND ORDER**

**WHEREAS**, Plaintiffs, Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively, “Plaintiffs” or “GEICO”) have commenced this action against, among others, Defendants Alexandr Zaitsev, M.D., Ridgewood Diagnostic Laboratory, L.L.C. (“Ridgewood”), and Metropolitan Interventional Medical Services, P.C. (“Metropolitan”) (collectively, the “Zaitsev Defendants” and with GEICO, the “Parties”); and

**WHEREAS**, the Parties have negotiated and executed this stipulation and are requesting that the Court So-Order the stipulation to preserve the status quo pending the final disposition of the Plaintiffs’ claims in this action.

**NOW, IT IS HEREBY STIPULATED AND AGREED** by and among counsel for Plaintiffs and the Zaitsev Defendants as follows:

1. The Zaitsev Defendants, as well as their attorneys, agents, and anyone purporting to act on their behalf, agree to stay and take no further action in any and all No-Fault insurance state court collection lawsuits between Ridgewood and/or Metropolitan and GEICO, , including but not limited to any adverse judgments that have been issued but payments have not been made by GEICO, until the final resolution of this action.

2. The Zaitsev Defendants, as well as their attorneys, agents, and anyone purporting to act on their behalf, agree to cooperate with Plaintiffs and take any other reasonable action (including communicating with any attorney or court) to advise of and effectuate the prohibition against Metropolitan and/or Ridgewood's efforts to seek collection of No-Fault benefits from GEICO in accordance with this Stipulation and Order.
3. The Parties agree that nothing in this Stipulation and Order shall amend or otherwise alter the terms of the Memorandum and Order entered by this Court on July 27, 2021 (ECF No. 134) staying all of the Zaitsev Defendants' pending arbitrations against GEICO and enjoining the Zaitsev Defendants from commencing new no-fault arbitrations or state court lawsuits against GEICO until resolution of this action.
4. A copy of this Stipulation and Order may be filed by any Party in any proceeding to enforce its terms, including but not limited to stay a lawsuit seeking the collection of no-fault insurance benefits by the Zaitsev Defendants against Plaintiffs.

**IT IS HEREBY STIPULATED AND AGREED BY:**

Dated: February 3, 2025

By: s/ Steven T. Henesy  
Steven T. Henesy, Esq.  
RIVKIN RADLER LLP  
926 RXR Plaza  
Uniondale, NY 11556  
(516) 357-3308  
*Counsel for Plaintiffs.*

By: s/ Robert Hewitt  
Robert Hewitt, Esq.  
SCHWARTZ, CONROY, & HACK, P.C.  
666 Old Country Road, 9th Floor  
Garden City, NY 11530  
(516) 745-1122  
*Counsel for Zaitsev Defendants*

SO ORDERED:

/S/ Frederic Block 2-6-2025